



September 3, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW, Room TW-A325
Washington, D.C. 20554

RE: **Federal Communications Commission, Notice of Proposed Rulemaking 19-53**
WiMAX Forum Petition to Adopt Service Rules for the Aeronautical Mobile Airport
Communications System (AeroMACS), RM-11793
Docket No. 19-140 (June 7, 2019)

Dear Secretary Dortch:

The American Association of Airport Executives (AAAE) appreciates the opportunity to provide comments in response to the Federal Communications Commission's (FCC) notice of proposed rulemaking (NPRM), "In the Matter of Amendment of the Commission's Rules to Promote Aviation Safety," issued on June 7, 2019. As a representative of more than 6,200 members at over 870 airports, from large hubs to general aviation facilities, AAAE is especially focused on maintaining and improving the safety of aircraft operations in the airport environment and recognizes the importance of ground-to-aircraft communications to further that goal. As a result, AAAE welcomes this proposed rulemaking and is pleased to offer these comments for your consideration.

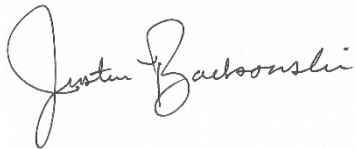
AAAE generally supports the FCC's proposed rules for implementing a broadband communications system to support airport surface operations in the United States, as well as the proposal to permit expanded use of a type of mobile station that helps reduce collisions between aircraft and airport ground vehicles. Certain members of AAAE have expressed interest in AeroMACS and believe the system would be valuable for promoting safety and improving the efficiency of aircraft movement around the airport environment. However, AAAE has several suggestions for improvements to the proposed rules.

In the NPRM, the FAA proposes to limit the eligibility for non-aircraft AeroMACS licenses to airport owners and operators, and entities that have been granted permission by the airport owner or operator to transmit using AeroMACS equipment at or near the airport. (NPRM, ¶ 38.) AAAE does not believe that airports should be responsible for granting permission to other entities. Instead, the FCC should adopt a more flexible and expanded approach that allows other users, such as airlines, aeronautical communications network providers, and other stakeholders, to automatically or more easily gain access to channels in the AeroMACS band.

Further, AAAE believes that the FCC should designate a single, nationwide channel manager to ensure non-discriminatory and fair management of AeroMACS channels. The channel manager, which should be an impartial expert, would maximize the use of AeroMACS spectrum and ensure its fair access to all prospective users. The manager could also promote coordination with the other authorized users of the AeroMACS band. This would be more efficient and less costly than relying upon the Federal Aviation Administration for pre-coordination of AeroMACS deployments.

AAAE appreciates the opportunity to provide comments to the FCC's NPRM on this important topic, and stands ready, willing, and able to assist the FCC in any way possible. Please do not hesitate to reach out if you have any questions or require any additional information. I can be reached at justin.barkowski@aaae.org or at (703) 824-0504.

Sincerely,

A handwritten signature in black ink, reading "Justin Barkowski". The signature is fluid and cursive, with the first name "Justin" and last name "Barkowski" clearly legible.

Justin T. Barkowski
Vice President, Regulatory Affairs